



May 25, 2023

VIA ECF

Judge J Paul Oetken
United States District Court
Southern District of New York
Room 2101
40 Foley Square
New York, New York 10007

Re: *Rathod v Wellington Physical Therapy and Acupuncture PLLC et al*, 23-cv-03276-JPO
Motion For Extension of Time to Answer or Move

Dear Judge Oetken:

My firm represents the defendants in this action. Pursuant to Your Honor's Individual Rule 3(C), and for the reasons set forth below, the Defendants hereby respectfully move for a 60-day extension of the deadline to answer or move in this action, to July 18, 2023. The Plaintiff consents to this request. This is the first request by the parties to extend any deadlines.

My firm was only recently retained. An extension of time to answer or move is necessary so that we can fully review the documents in this matter, and consult with and advise our clients. In addition, an extension of time is necessary so that we can have early settlement discussions with the Plaintiff's attorney.

For the above reasons, we respectfully request that the Court grant this motion, and order that the Defendants shall answer or move against the Complaint in this action on or before June 26, 2023.

Respectfully submitted,

/s/ Tom Fini

cc: All counsel of record (via ECF)